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Attorney for Harquahala Valley Power District

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BEFORE THE ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE

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IN THE MATTER OF THE APPLICATION 10

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OF SOUTHERN CALIFORNIA EDISON) Docket No. L-00000A-06-0295-00130 COMPANY AND ITS ASSIGNEES IN CONFORMANCE WITH THE REQUIREMENTS) Case No. 130 OF ARIZONA REVISED STATUTES SECTIONS) 40-360.03 AND 40-360.06 FOR A CERTIFICATE) OF ENVIRONMENTAL COMPATIBILITY **AUTHORIZING CONSTRUCTION OF A 500kV** ALTERNATING CURRENT TRANSMISSION LINE AND RELATED FACILITIES IN **NOTICE OF INTENT** TO BE A PARTY MARICOPA AND LA PAZ COUNTIES IN ARIZONA ORIGINATING AT THE HARQUAHALA GENERATING STATION SWITCHYARD IN WESTERN MARICOPA COUNTY AND TERMINATING AT THE DEVERS SUBSTATION IN RIVERSIDE COUNTY, CALIFORNIA

Harquahala Valley Power District ("HVPD"), is a power district organized under the laws of the State of Arizona (A.R.S. 48-1501, et seq.), and, as such, is a municipal corporation of the State (A.R.S. § 48-2901) and a political subdivision of the State of Arizona (Article 13 § 7. Constitution of Arizona). Pursuant to the provisions of A.R.S. § 40-360.05 and Arizona Administrative Code R14-3-204, HVPD hereby files this Notice of Intent To Be A Party.

HVPD is an active power district comprising more than 30,000 irrigated acres. It supplies electricity to more than 80 irrigation pumps and other agricultural-related electric

facilities in the Harquahala Valley in Maricopa County, approximately 60 miles west of Phoenix. HVPD encompasses remote and secluded lands that are developed into highly valuable and productive farms, together with a small component of "ranchette" subdivision properties. These farmlands also enjoy unobstructed, panoramic views of the uniquely shaped, scenic mountains surrounding the valley, adding to the valley's long-term economic value in the context of the population growth projected for the outlying regions of Arizona.

HVPD's interest in these proceedings arises from the Application's inclusion of the "Harquahala-West Subalternate Route" for the DPV2 line (page 3, lines 10-16, Notice of Hearing). As an alternative to a portion of the primary proposed route, the Applicant seeks approval of a 1,000 foot-wide, East-West corridor that would cut a swath across the heart of the valley along what would be the Thomas Road extension, literally bisecting the entirety of HVPD lands. Approval of this corridor was previously requested for construction of the original DPV1 500kV line; but, it was appropriately denied in favor of the currently constructed DPV1 alignment. The DPV1 alignment skirts the HVPD farmlands to the North and completely avoids any interference with HVPD or the Harquahala Valley Irrigation District (HVID) and its canals, laterals and other water delivery related structures and operations, or the farmland and the ongoing agricultural operations such as aerial crop-dusting and the use of high-profile equipment.

HVPD fully supports Applicant's proposed project, <u>if</u> it is constructed essentially along the existing DPV1 corridor. Conversely, HVPD vigorously opposes any serious consideration of the Harquahala-West Subalternate Route because of the significant adverse impacts on HVPD, its landowner members and farmers, and the overall scenic, aesthetic, social and economic values and interests of the general rural community of the Harquahala Valley.

While the Harquahala-West Sub-alternate route may be physically shorter than the preferred route, it would predictably be more expensive due to the increased cost to acquire right-of-way through the developed and increasingly valuable farmland and adjacent subdivisions, as opposed to the preferred route's undeveloped desert lands paralleling the existing DPV1 corridor where the adverse economic devaluation impacts of an EHV transmission line have already been incurred by virtue of the existing line.

HVPD supports the Harquahala Generating Station and recognizes the challenges it faces in the current merchant electricity market. HVPD believes that Applicant's proposed transmission project would enhance the viability of the Harquahala Generating Station. HVPD supports the proposed preferred route utilizing mainly the existing DPV1 corridor, and urges the Committee to reject and deny Applicant's request for approval of any and all portions of the Harquahala-West Subalternate Route.

Respectfully submitted this 15th day of June, 2006.

Moyes Storey, Ltd.

Attorneys for Harquahala Valley

Power District

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2	25 copies of this Notice of Intent have been filed with the Director of Utilities, the Arizona Corporation Commission
3	This/5 day of June, 2006.
4	Copy sent same date to:
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